

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN**

JEANNA NORRIS, on behalf of herself)
and all others similarly situated,)
)
)
Plaintiffs,)
)
)
v.)
) Case No. 1:21-cv-756
SAMUEL STANLEY, JR., in his)
official capacity as President of)
Michigan State University; DIANNE)
BYRUM, in her official capacity as Chair)
of the Board of Trustees, DAN KELLY,)
in his official capacity as Vice Chair)
of the Board of Trustees; and RENEE)
JEFFERSON, PAT O'KEEFE,)
BRIANNA T. SCOTT, KELLY TEBAY,)
and REMA VASSAR in their official)
capacities as Members of the Board of)
Trustees, of Michigan State University,)
and John and Jane Does 1-10,)
)
Defendants.)

**MOTION FOR ALTERNATIVE FORMS OF RELIEF IN LIGHT OF THE
UNAUTHORIZED LATE FILING OF A SECOND DR. ZERVOS DECLARATION**

Pursuant to Fed. R. Civ. P. 12(f) and this Court's inherent authority to manage this litigation, Plaintiff hereby moves for the Second Declaration of Dr. Zervos filed yesterday (Dkt # 17) to be stricken or for alternative relief to be granted as explained in the accompanying brief in support of this motion.

September 21, 2021

Respectfully submitted,

/s/ Jenin Younes
Jenin Younes

Litigation Counsel
Jenin.Younes@ncla.legal
Admitted in this Court
* Admitted only in New York. DC practice limited to matters and proceedings before United States courts and agencies.
Practicing under members of the District of Columbia Bar.
/s/ Harriet Hageman
/s/ Harriet Hageman,* MSB #87482
Senior Litigation Counsel
Admitted in this Court
Harriet.Hageman@ncla.legal
* Admitted only in Wyoming, Colorado, and Nebraska. Practice limited to matters and proceedings before United States Courts and agencies. Practicing under members of the District of Columbia Bar.

/s/ John Vecchione
/s/ John Vecchione
Senior Litigation Counsel
John.Vecchione@ncla.legal
Admitted in this Court

NEW CIVIL LIBERTIES ALLIANCE
1225 19th Street NW, Suite 450
Washington, DC 20036
Telephone: (202) 869-5210
Facsimile: (202) 869-5238

Attorneys for Plaintiffs